

To anticipate a claim under § 102, a single prior art reference must identically disclose each and every claim element. See Lindeman Machinenfabrik v. American Hoist and Derrick, 730 F.2d 1452, 1458 (Fed. Cir. 1984). If any claimed element is absent from a prior art reference, it cannot anticipate the claim. See Rowe v. Dror, 112 F.3d 473, 478 (Fed. Cir. 1997).

The Office Action states that the Fry reference discloses a plug connector and mating connector as recited in claim 1. The Office Action also states that the Fry reference discloses a centering element having a lug-like form and configured to cooperate with the mating connector. The Examiner maintains that the Fry reference discloses a mating connector which includes components 18, 20 and 22 which are utilized for mating as elements of the mating connector. The Examiner states that the element 22 with the recess, when taken with elements 18 and 20, is considered the mating connector.

The Fry reference relates to a floating panel mount system for mounting electrical connectors to panels. (Fry reference, Col. 1, lines 49-51). The Examiner equates the electrical connector 16 of the Fry reference with the plug connector of claim 1, and the Examiner equates the panel 18, connecting device 20 and retaining cap 22, collectively, of Fry reference with the mating connector of claim 1. Presumably, the Examiner is asserting that the three separate elements, when viewed together, equates to the single composite mating connector of claim 1.

As stated in the prior response, the Fry reference simply does not disclose a mating connector as recited in claim 1. Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claim invention, arranged as in the claim. Lindeman, 703 F.2d 1458 (Emphasis added). Furthermore, the prior art reference must describe the applicant's claimed invention sufficiently to have placed a person of

ordinary skill in possession of it. Motorola, Inc. v. Interdigital Tech. Corp., 43 U.S.P.Q. 2d 1481, 1490 (Fed. Cir. 1991). Although this disclosure requirement presupposes the knowledge of one skilled in the art, that presumed knowledge does not grant a license to read into the prior art reference teachings that are not there. Id. (Emphasis added).

The Fry reference states that the electrical connector 16 is part of a layer of a unitarily molded electric housing which has a mating portion 30 and locking arms 44. The mating portion 30 and locking arms 44 pass through apertures 24, 26 of the panel 18. The Fry reference states that the panel 18 is for mating with a complementary connecting device 20. The connecting device 20 includes a plurality of through passages 38 for receiving connector 16. The Fry reference states that retaining caps 22, as discrete devices, lockingly engage with locking arms 44 after the locking arms 44 pass through outside apertures 26. The Fry <sup>28</sup> reference clearly states that the retaining caps 22 prevent the entire connector housing and various components from breaking out of the apertures. (Fry reference, Col. 3, lines 25-67).

Contrary to the Examiner's presumptions, the Fry reference clearly teaches that the panel 18, connecting device 20 and retaining caps 22 function as three separate components in the floating panel mount system 14. The Fry reference does not teach that these components should be taken as whole; instead, the Fry reference teaches that these components exist autonomously. This is in stark contrast to claim 1, which recites a mating connector having a recess, where the mating connector is a single component which includes the recess. The plain disclosure of the Fry reference clearly teaches away from interpreting the combination of three components as an equivalent of a single component. Accordingly, the Fry reference does not disclose each element of claim 1 as arranged in claim 1, and the Examiner has improperly read teachings into the Fry reference in order support this improper anticipation rejection. Based on the foregoing, the Fry reference simply does not anticipate

claim 1. Claims 2-6 depend from claim 1, so the above argument regarding claim 1 applies equally to claims 2-6. Withdrawal of this rejection is respectfully requested.

### **CONCLUSION**

In light of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

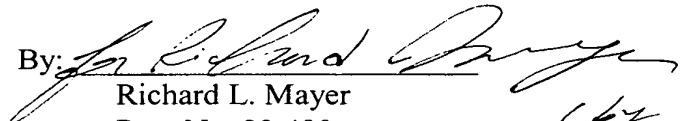
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Respectfully submitted,

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Dated: February 20, 2002

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